

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION



UNITED STATES OF AMERICA

v.

YEAKAIN YABU KOROMA,

Defendant.

Case No. 1:19-cr-327

STATEMENT OF FACTS

The United States and the defendant, YEAKAIN YABU KOROMA (hereinafter, “the defendant”), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. Between on or about January 19, 2018, and on or about June 5, 2018, in Prince William County, Virginia, within the Eastern District of Virginia, the defendant, YEAKAIN YABU KOROMA, not being a licensed firearms dealer within the meaning of Chapter 44, Title 18, United State Code, did wilfully engage in the business of dealing in firearms, such firearms having been shipped and transported in interstate commerce.

2. Beginning on or about January 2018, Cornelius Maurice King, Jr. began discussing with another individual (hereinafter “CW”) King’s desire to purchase firearms from CW. The defendant knew CW and introduced CW to King. King, working with the defendant, purchased several firearms from CW. The defendant was identified as the purchaser on a number of bills of sale used to purchase firearms from CW. The defendant also directly paid CW for several of the firearms and took possession of the firearms from CW.

3. Between on or about January 19, 2018 and on or about June 5, 2018, the defendant, working with King, sold twenty-six (26) firearms to third parties. These firearms sales were

memorialized in bills of sale, with each identifying the defendant as the seller of the firearm. The types of firearms included in these bills of sale include:

- a. two Glock G30 .45 caliber pistols;
- b. a Remington RP9 9mm pistol;
- c. two Glock G27 .40 caliber pistols;
- d. two American Tactical .223/5.56 AR pistols;
- e. a Glock G23 .40 caliber pistol;
- f. two Smith & Wesson SD40VE .40 caliber pistols;
- g. a Taurus Millennium G2 9mm pistol;
- h. two Mini Draco 7.62x39 AK pistols;
- i. a Springfield XD 9mm pistol;
- j. a Glock G19 9mm pistol;
- k. a Glock G26 9mm pistol;
- l. a Hi-Point 3895TS Carbine .380 ACP rifle;
- m. a Glock G36 .45 caliber pistol;
- n. a Mossberg .22 LR pistol;
- o. a Smith & Wesson M&P45 Shield .45 caliber pistol;
- p. a Taurus Millennium PT111 9mm pistol;
- q. a Glock G17 9mm pistol;
- r. two Smith & Wesson M&P9c 9mm pistols;
- s. a Glock G22c .40 caliber pistol; and
- t. a .40 caliber pistol that was either a Smith & Wesson or a Springfield XD.

4. The firearms discussed in this statement of facts were not manufactured in the Commonwealth of Virginia, and, therefore, the firearms traveled in, and/or affected interstate commerce.

5. Neither the defendant nor King are licensed firearms dealers.

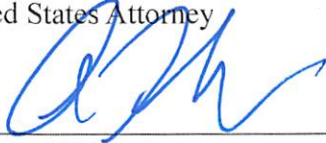
6. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

7. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,


G. Zachary Terwilliger
United States Attorney

Date: October 31, 2019

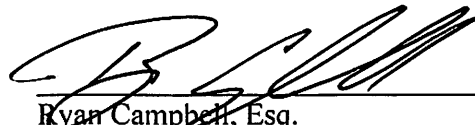
By: 

Anthony W. Mariano
Special Assistant United States Attorney
Patricia T. Giles
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, YEAKAIN YABU KOROMA, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


YEAKAIN YABU KOROMA

I am Ryan Campbell, the defendant's attorney. I have carefully reviewed the above Statement of Facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.


Ryan Campbell, Esq.
Counsel for the Defendant